

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

D&T PARTNERS, LLC (successor in interest
to ACET VENTURE PARTNERS, LLC),
Directly and Derivatively on Behalf of
ACET GLOBAL, LLC and
BAYMARK ACET HOLDCO, LLC

and

ACET Global, LLC,

Plaintiffs,

v.

CIVIL CAUSE NO. 3:21-cv-01171-B

BAYMARK PARTNERS, LP;
BAYMARK PARTNERS
MANAGEMENT, LLC;
BAYMARK MANAGEMENT, LLC;
SUPER G CAPITAL, LLC;
SG CREDIT PARTNERS, INC.;
BAYMARK ACET HOLDCO, LLC;
BAYMARK ACET DIRECT INVEST, LLC;
BAYMARK PARTNERS;
et al.,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE
TO RESPOND TO DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS'
SECOND AMENDED COMPLAINT**

COMES NOW Plaintiffs, D&T Partners, LLC (successor in interest to ACET Venture Partners, LLC), directly and derivatively on behalf of ACET Global, LLC and Baymark ACET Holdco, LLC, and ACET Global, LLC (together, the "Plaintiffs"), in the above-styled and numbered case, by and through their attorney of record, and respectfully move this Court to extend the deadline to respond to Defendants' Motions to Dismiss Plaintiffs' Second Amended Complaint currently scheduled for Friday, August 12, 2022.

In support of this Agreed Motion for Continuance (the “Motion”), the moving attorney states as follows:

1. On June 8, 2022, Plaintiffs filed their Second Amended Complaint in the above-styled case, naming one additional defendant.
2. On July 22, 2022, 20 of the 22 named Defendants collectively filed eight (8) Motions to Dismiss.
3. Rule 7.1 of the Local Rules of the U.S. District for the Northern District of Texas states that “[a] response and brief to an opposed motion must be filed within 21 days from the date the motion is filed.”
4. Undersigned counsel, despite diligence in his efforts, requires additional time to prepare responses to each of the eight Motions to Dismiss.
5. As a result, Plaintiffs request additional time—21 days—to respond to the Defendants’ eight Motions to Dismiss by Friday, September 2, 2022.
6. Granting the Plaintiffs’ Motion will allow the Plaintiffs the opportunity to appropriately brief their responses to the Motions to Dismiss. This request is not made for delay alone, and no party to this proceeding would be unfairly prejudiced by the relief requested in this Motion. Good cause, therefore, exists for the Court to grant the relief requested herein.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that the Court grant this Unopposed Motion to Extend Deadline to Respond to Defendants’ Motions to Dismiss Plaintiffs’ Second Amended Complaint, extend the Plaintiffs’ time to respond to the Motions to Dismiss by 21 days, and grant such other and further relief to which Plaintiffs are justly entitled.

Dated: August 11, 2022

Respectfully Submitted,

By: /s/ Jason B. Freeman

Jason B. Freeman

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2022, I filed the foregoing pleading via the Court's CM/ECF system, which will send electronic notice to all counsel of record.

/s/ Jason B. Freeman

Jason B. Freeman

CERTIFICATE OF CONFERENCE

I hereby certify that my office has conferred with counsel for all Defendants (except Baymark Partners, LP, who has not made an appearance in this matter) regarding this pleading. Counsel for the Defendants are unopposed to the requested extension in Plaintiffs' Unopposed Motion to Extend Deadline to Respond to Defendants' Motions to Dismiss Plaintiffs' Second Amended Complaint.

/s/ Jason B. Freeman

Jason B. Freeman